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MEMO ENDORSED

*Harvard and the Union's  
time to file objections to Judge  
Aaron's R+R is extended to  
October 6, 2023.*

September 19, 2023

Via ECF

The Honorable Paul G. Gardephe  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 11C  
New York, NY 10007-1312

SO ORDERED:

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.  
Sept. 22, 2023

**Re: Case 1:22-cv-03068 – Cruz v. 32BJ, et. al.**  
**Request for Extension of Time to File Objections to Magistrate Judge**  
**Aaron's Report and Recommendation**

Dear Judge Gardephe:

Defendant Harvard Maintenance, Inc. ("Harvard") by and through its attorneys, Epstein Becker & Green, P.C., respectfully requests an extension of two weeks, until Monday October 6, 2023 ("Request for Extension of Time") to file Objections to the Report and Recommendation issued by Magistrate Judge Stewart D. Aaron on September 9, 2023. This additional time is necessary to complete review of the Report and Recommendation, specifically the portion granting Plaintiff Carina Cruz's request to file another Amended Complaint.

We have been informed by counsel for Defendant 32BJ Service Employees International Union that it joins in Harvard's request. Plaintiff has informed counsel for Harvard that she does not object to the Defendants' requests being granted and that she intends to make a separate request for additional time to file Objections to the Report and Recommendation. Plaintiff declined to respond to our inquiry as to the amount of additional time she intends to request to file her Objections. We ask that if Ms. Cruz is ultimately granted a longer extension of time to file Objections than is requested by the Defendants, that the Court grant Defendants such additional time as well.

Thank you in advance for your consideration.

Respectfully submitted,

/s/ Steven M. Swirsky  
Steven M. Swirsky

Honorable Paul G. Gardephe  
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*Counsel for Harvard Maintenance, Inc.*